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May 24, 2002

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MAY 24 2002

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Review of Part 15 and Other Parts of the Commission's Rules**
ET Docket No. 01-108 278
Ex Parte Communication

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of the Short Range Automotive Radar Frequency Allocation Group ("SARA"), an association of automotive and automobile component manufacturers ^{1/}, to notify you of an *ex parte* meeting on May 23, 2002 with officials in the Office of Engineering Technology ("OET"). The meeting was held to discuss SARA's comments in this docket.

The meeting focused largely on whether the Commission should impose limits on receiver emissions as part of this proceeding. As SARA's comments in this proceeding make clear, the Commission should refrain from imposing receiver emission limits in the 24 GHz band, a band in which SARA's members plan to operate UWB automotive short range radars ("SRRs"), as no evidence of interference from receiver emissions in the 24 GHz has been placed in the proceeding record.

SARA believes, in general, that the Commission should avoid imposing emissions limits on all radio receivers regardless of frequency band, because the record, which largely focuses on radar detectors in the 11.7-12.2 GHz band, does not support such a broad-based approach. In particular, SARA notes that there is no record to

^{1/} SARA is made up of the following automotive component manufacturers: A.D.C., Bosch, Delphi Automotive Systems, Hella, InnoSent, Megamos, Siemens VDO, TRW, Tyco Electronics, Valeo and Visteon. It also includes the following automobile manufacturers: Audi, BMW, DaimlerChrysler, Fiat, Ford, General Motors, Jaguar, MAN, Opel, Porsche, PSA Peugeot Citroën, Renault, Saab, Seat, Skoda, Volkswagen and Volvo.

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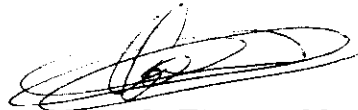
support receiver emission limits in the 24 GHz range. SARA takes no position, however, on the narrow issue of whether receiver emission limits should be imposed on radar detectors operating in the 11.7-12.2 GHz band.

Should the Commission decide in this proceeding to impose receiver emission limits beyond 11.7-12.2 GHz, SARA urges that such rules be limited to "radar detectors." In order to ensure that the Commission's radar detector limits do not apply beyond the narrow category of devices identified in this proceeding as causing harmful interference, SARA suggests that the term "radar detector" be defined as: "a device that receives radar signals 100 percent of the time when functioning and which has no radar transmission capability." Such a definition would ensure that homodyne devices such as police speed-measuring radar guns and SARA's SRRs are not mistakenly captured within the scope of a receiver emission rule. ^{2/}

Attached is a copy of the presentation made to OET. Meeting attendees included Julius Knapp, Geraldine Matise, Karen Rackley and Hugh Van Tuyl of OET, Jeff Krauss, Consultant to M/A-COM and Ari Fitzgerald and David Martin of Hogan & Hartson.

An original and one copy of this letter are submitted for inclusion in the proceeding record.

Respectfully submitted,



Ari Q. Fitzgerald
Counsel for SARA

Enclosure

cc (w/enc.): Mr. Julius Knapp
Ms. Geraldine Matise
Ms. Karen Rackley
Mr. Hugh Van Tuyl

^{2/} Cf. SARA Comments at 10 (February 12, 2002).

24 GHz Short Range Radar



Short Range Automotive Radar Frequency Allocation Group

**Presentation Regarding
Proposed Receiver Emission Limits**

ET Docket No. 01-278

before the

**Office of Engineering and Technology
Federal Communications Commission**

May 23, 2002

Audi, BMW, DaimlerChrysler, Fiat, Ford, Jaguar, Opel / GM, Porsche, PSA Peugeot Citroën, Renault, Saab, Seat, Volkswagen, Volvo, A.D.C., Bosch, Delphi, InnoSent, Megamos, Siemens VDO, TRW, Tyco Electronics, Valeo, Visteon.

SARA's POSITION on RECEIVER EMISSION LIMITS:

- The Commission should not impose new, overly-broad regulations unless specific need is justified by the record.
 - There have been no documented cases of interference in the 24 GHz band; no receiver limits are justified in this band.
 - SARA takes no position on the need for limits in the 11.7 – 12.2 GHz band to protect VSAT operations.

SARA's POSITION on RECEIVER EMISSION LIMITS:

- **The Comments do not support generally-applicable receiver limit.**
 - **Most satellite operators called only for limits on *radar detectors* in the 11.7 – 12.2 GHz band. Thus, even parties experiencing interference recognize that solution should be narrowly-focused.**
 - **Hughes Network Systems specifically agreed with SARA that new limit should not apply to all receivers.**
 - **Of the very few (4) commenters proposing limits on all receivers in all bands, only one (Spacenet/Starband) has actually experienced interference.**
- **Any rule that imposes limits on radar detectors should be drafted clearly to avoid any suggestion that vehicular radars are covered by the rule.**